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5
6 Attorney for Christopher McDermott

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9
10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 CHRISTOPHER MCDERMOTT,
14 Defendant.

15 Case No. 2:15-cr-222-RFB

16 **STIPULATION TO CONTINUE
SENTENCING DATE**
(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
United States Attorney, and Susan Cushman, Assistant United States Attorney, counsel for the
United States of America, and Rene L. Valladares, Federal Public Defender, and Raquel Lazo,
Assistant Federal Public Defender, counsel for Christopher McDermott, that the sentencing
hearing currently scheduled for January 6, 2016 at the hour of 10:00 a.m., be vacated and
continued to a date and time convenient to the Court, but no earlier than thirty (30) days.

22 This Stipulation is entered into for the following reasons:

23 1. Additional time is needed to review the presentence investigation with Mr.
McDermott
~~Cabrera-Reyes~~. Defense counsel also requires additional time to conduct sentencing mitigation
24 and file a sentencing memorandum.

25 2. The defendant is not incarcerated and does not object to the continuance.

1 3. The parties agree to the continuance.

2 4. The additional time requested herein is not sought for purposes of delay, but
3 merely to allow counsel for defendant sufficient time within which to be able to complete her
4 mitigation for sentencing purposes.

5 This is the second request to continue the sentencing date filed herein.

6 DATED this 11th day of December, 2015

7
8 RENE L. VALLADARES
Federal Public Defender

9
10 DANIEL G. BOGDEN
United States Attorney

11 By _____
12 RAQUEL LAZO
Assistant Federal Public Defender

13 By _____
14 SUSAN CUSHMAN
Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
CHRISTOPHER MCDERMOTT,
Defendant.

Case No. 2:15-cr-222-RFB

FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Additional time is needed to review the presentence investigation with Mr. McDermott ~~Cabrera Reyes~~. Defense counsel also requires additional time to conduct sentencing mitigation and file a sentencing memorandum.

2. The defendant is not incarcerated and does not object to the continuance.

3. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for defendant sufficient time within which to be able to complete her mitigation for sentencing purposes

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
CHRISTOPHER MCDERMOTT,
Defendant.

Case No. 2:15-cr-222-RFB

ORDER

V

CHRISTOPHER McDERMOTT,
Defendant.

Defendant.

Based on the pending Stipulation of counsel, and good cause appearing,

IT IS THEREFORE ORDERED that the sentencing hearing currently scheduled for Wednesday, January 6, 2016 at the hour of 10:00 a.m., be vacated and continued to 2/08/2016 at the hour of 1:30 p.m.

DATED this 14th day of December, 2015

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RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE